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Including Professional Corporations  
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Attorneys for The Roman Catholic Archbishop of  
San Francisco

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re  
The Roman Catholic Archbishop of San  
Francisco,  
  
Debtor and  
Debtor in Possession.

Case No. 23-30564  
Chapter 11  
Adv No. 25-03019

**NOTICE OF FULLY EXECUTED  
STIPULATION BY AND AMONG  
THE ROMAN CATHOLIC  
ARCHBISHOP OF SAN  
FRANCISCO, THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS, AND THE SURVIVOR  
DEFENDANTS**

The Roman Catholic Archbishop of San  
Francisco,  
  
Plaintiff,

Judge: Hon. Dennis Montali  
Date: September 4, 2025  
Time: 1:30 p.m.  
Place: Zoom.Gov

v.

1 John DB Roe SF, John Doe H.M, C.M.,  
2 John Doe SF 1218, Jane Doe SF 2017,  
3 John Roe 521, John Roe 663, John Doe  
4 664, LL John Doe WC, John Doe SF  
5 2028, John Doe SF 1510, John Doe, John  
6 Roe 644, Jane Roe, G.J., M.R.H., John  
7 Doe SF 1426, John Doe L.M., John Roe  
8 457, John Doe A.D.R., John Doe A.L.R.,  
9 John Roe 417, John Roe 499, G.W.,  
10 Joseph Doe OAK 475, John Doe MR  
11 1236, Jane Doe 7, John PV Roe 554, John  
12 Doe F.O., John Doe CLG03522, John Doe  
13 SF 1913, Jane Doe SF 1260, John Doe SF  
14 1026, John Doe SF 1196, Jane Doe SF  
15 1200, John Doe SF 1201, Jane Doe SF  
16 1233, Joseph Doe SF 601, and Jane Doe  
17 116,

Defendants,

12 **NOTICE IS HEREBY GIVEN** that the Roman Catholic Archbishop of San Francisco, the  
13 debtor and debtor in possession (“Plaintiff” or “RCASF”), in the above-captioned chapter 11  
14 adversary case, hereby files the attached fully executed *Stipulation by and Among the Roman*  
15 *Catholic Archbishop of San Francisco, the Official Committee Of Unsecured Creditors, and the*  
16 *Survivor Defendants*

17 Dated: September 15, 2025

FELDERSTEIN FITZGERALD WILLOUGHBY  
PASCUZZI & RIOS LLP

18  
19 By: /s/ Paul J. Pascuzzi  
Paul J. Pascuzzi  
20 Attorneys for The Roman Catholic Archbishop of  
San Francisco

21 Dated: September 15, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON  
LLP

22  
23 By: /s/ Ori Katz  
Ori Katz  
24 Attorneys for The Roman Catholic Archbishop of  
San Francisco

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**STIPULATION BY AND AMONG  
THE ROMAN CATHOLIC  
ARCHBISHOP OF SAN  
FRANCISCO, THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS, AND THE SURVIVOR  
DEFENDANTS**

The Roman Catholic Archbishop of San  
Francisco,  
  
Plaintiff,  
  
v.

Judge: Hon. Dennis Montali  
Date: July 17, 2025  
Time: 1:30 p.m.  
Place: Zoom.Gov

1 John DB Roe SF, John Doe H.M, C.M.,  
2 John Doe SF 1218, Jane Doe SF 2017,  
3 John Roe 521, John Roe 663, John Doe  
4 664, LL John Doe WC, John Doe SF  
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SF 1913, Jane Doe SF 1260, John Doe SF  
1026, John Doe SF 1196, Jane Doe SF  
1200, John Doe SF 1201, Jane Doe SF  
1233, Joseph Doe SF 601, and Jane Doe  
116,  
Defendants,

11 The Roman Catholic Archbishop of San Francisco (the “Debtor”), the Official Committee  
12 of Unsecured Creditors (the “Committee”), each of the defendants in the above-captioned adversary  
13 proceeding that have not previously agreed to stay their cases (the “Survivor Defendants”), and the  
14 plaintiffs in the Released State Court Actions (defined below) (the “Plaintiffs”; collectively the  
15 Debtor, the Committee, the Survivor Defendants, and the Plaintiffs are the “Parties” and each is a  
16 “Party”), stipulate and agree as follows:

### 17 RECITALS

18 A. The Debtor filed a voluntary petition with this Court under chapter 11 of the  
19 Bankruptcy Code on August 21, 2023 (the “Petition Date”), which chapter 11 case No. 23-30564  
20 (the “Bankruptcy Case”) is pending before the Bankruptcy Court for the Northern District of  
21 California (the “Bankruptcy Court”).

22 B. The Office of the United States Trustee appointed the Committee on September 1,  
23 2023, pursuant to 11 U.S.C. § 1102.

24 C. In October 2019, Governor Gavin Newsom signed AB 218, known as the California  
25 Child Victims Act (the “CVA”), which expanded legal protections for survivors of child sexual  
26 abuse (“Survivors”). The CVA went into effect on January 1, 2020, opening a three-year “revival  
27 window” during which any Survivor could file civil claims regardless of when the abuse occurred.

1 D. During the CVA's revival window, approximately 541 Survivors filed civil actions  
2 against the Debtor, virtually all of which have been consolidated (along with other Northern  
3 California clergy cases naming other defendants) into a coordinated proceeding entitled *In re*  
4 *Northern California Clergy Cases*, JCCP No. 5108 in the Superior Court of California, County of  
5 Alameda (the "State Court").

6 E. Thirty-nine of those actions include as named defendants at least one of the non-  
7 Debtor affiliates listed on ***Exhibit A*** (the "Non-Debtor Affiliates"). These actions are identified in  
8 ***Exhibit B*** (collectively, the "Affiliate State Court Actions").

9 F. On April 28, 2025, the Debtor initiated the above-captioned adversary proceeding by  
10 filing a complaint for declaratory and injunctive relief that would prevent all the Affiliate State Court  
11 Actions from proceeding for the duration of the Debtor's Bankruptcy Case.

12 G. On May 29, 2025, the Debtor and the Committee stipulated that the Committee is  
13 permitted to appear, be heard, and intervene, which was approved by the Court [Adv. Pro. ECF Nos.  
14 7, 11].

15 H. On May 29, 2025, the Debtor filed a *Motion for Order Extending Stay to All State*  
16 *Court Cases in Which Debtor and/or Non-Debtor Affiliates Are Named as Defendants Under*  
17 *Bankruptcy Code Sections 105(a) and 362* along with supporting declarations and exhibits [Adv.  
18 Pro. ECF No. 8] (the "Injunction Motion"), seeking both a declaration that the automatic stay  
19 extends to all Affiliate State Court Actions and, in the alternative, an injunction that would prevent  
20 all Affiliate State Court Actions from proceeding for the duration of the Debtor's Bankruptcy Case.

21 I. On June 12, 2025, the Committee filed an *Opposition* and supporting documents to  
22 the Injunction Motion [Adv. Pro. ECF Nos. 13-15].

23 J. On June 13, 2025, the Debtor and the Committee stipulated to a voluntary stay of the  
24 Affiliate State Court Actions naming the High Schools as defendants, which was approved by the  
25 Court [Adv. Pro. ECF Nos. 17, 19].

26 K. On June 20, 2025, the Debtor filed a *Reply* to the Injunction Motion [Adv. Pro. ECF  
27 No. 18].

1 L. On June 24, 2025, the Debtor and the Committee agreed to continue the court hearing  
2 on the Injunction Motion from June 26, 2025 until July 17, 2025 at 1:30 p.m.

3 ///

4 **STIPULATION**

5 1. The above recitals are incorporated by reference.

6 2. Subject to Paragraph 3, the Parties agree to a stipulated injunction pursuant to 11  
7 U.S.C. § 105(a), enjoining prosecution of the Affiliate State Court Actions, including against the  
8 Non-Debtor Affiliates named therein (the “Stipulated Stay Injunction”).

9 3. Attached as ***Exhibit C*** is a list identifying 5 state court actions (the “Released State  
10 Court Actions”) to be released from the Stipulated Stay Injunction that shall proceed to trial, subject  
11 to the following terms:

12 a. The Plaintiffs may prosecute, and any court where the action is pending may  
13 proceed with all necessary actions to adjudicate, the Released State Court Actions through final  
14 judgment, including against the Debtor and all non-Debtor defendants.

15 b. The Debtor is authorized to pay reasonable defense fees and costs in the  
16 Released State Court Actions that are not paid by an insurer, notwithstanding any prior order of the  
17 Court.

18 c. Entry of a judgment against any defendant in the Released State Court  
19 Actions shall not create a lien against any non-insurance asset of the Debtor or any Non-Debtor  
20 Affiliate. Nothing in this Stipulation should be construed to prevent a lien from attaching to the  
21 Debtor’s and/or any Non-Debtor Affiliate’s insurance policies or the proceeds of such policies, or  
22 the assets of any defendant that is not the Debtor or a Non-Debtor Affiliate or the enforcement of  
23 such lien.

24 d. No Plaintiff may create or take any action to effectuate the creation or  
25 imposition of any lien against any non-insurance asset(s) of the Debtor or any Non-Debtor Affiliate.  
26 Further, no Survivor may collect, levy, execute, or otherwise enforce any judgment against any non-  
27 insurance asset(s) of the Debtor or any Non-Debtor Affiliate.

1           4.       The Parties agree that all Survivors (regardless of whether their claims are selected  
2 as Released State Court Actions) may make written settlement demands on the Debtor and any non-  
3 Debtor defendant(s) and request that the Debtor and any non-Debtor defendant(s) tender those  
4 demands on their respective insurers and request that the insurers pay those demands. The Parties  
5 further agree that such demands are not a violation of the Stipulated Stay Injunction or the stay  
6 imposed by 11 U.S.C. § 362(a).

7           5.       Except as provided in Paragraphs 3, nothing in this Stipulation provides for the  
8 modification or vacatur of the automatic stay imposed by 11 U.S.C. § 362(a).

9           6.       Nothing in this Stipulation is an admission by any Party as to the allegations in the  
10 Injunction Motion or any opposition or reply filed thereto, or the merits of any of the issues raised  
11 therein.

12           7.       Any Party may request that the Bankruptcy Court modify or rescind the Stipulated  
13 Stay Injunction, except that the Released State Court Actions shall not be stayed or otherwise  
14 enjoined without the consent of the Committee and the applicable Plaintiff/Survivor, or by the Court  
15 upon a showing of extraordinary circumstances. The requesting party must give the Debtor and the  
16 Committee at least three (3) days' written notice prior to filing the request and may not set the matter  
17 for hearing on less than 30 days' notice from the time of filing. In connection with such a request,  
18 nothing in this Stipulation modifies the Parties' respective burdens of proof that they bore in relation  
19 to the Injunction Motion.

20           8.       The Parties request that the Court approve this Stipulation and enter the proposed  
21 order attached hereto as ***Exhibit 1.***

22  
23 Dated: July \_\_, 2025

**FELDERSTEIN FITZGERALD  
WILLOUGHBY PASCUZZI & RIOS LLP**

24  
25 By /s/ Paul J. Pascuzzi  
26 Paul J. Pascuzzi  
27 Attorney for Debtor and Debtor in Possession  
The Roman Catholic Archbishop of San Francisco

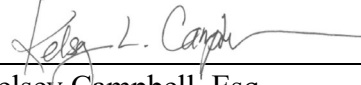
28 Dated: July \_\_, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

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By /s/ Brittany M Michael  
James I. Stang  
Brittany M. Michael  
Gail S. Greenwood  
*Counsel for the Official Committee of  
Unsecured Creditors*

Dated: July 25, 2025

**BOUCHER LLP**  
By   
Kelsey Campbell, Esq.  
*Counsel for John Doe L.M. and John Doe W.C.D.*

Dated: July \_\_, 2025

**KBM LAW**  
By \_\_\_\_\_  
Karen Barth Menzies, Esq.  
*Counsel for John Doe H.M.*

Dated: July \_\_, 2025

**DONAHOO & ASSOCIATES, PC**  
By \_\_\_\_\_  
Richard E. Donahoo, Esq.  
*Counsel for C.M., G.J., and M.R.H.*

Dated: July \_\_, 2025

**HERMAN LAW**  
By \_\_\_\_\_  
Justin Felton, Esq.  
*Counsel for G.W.*

Dated: July \_\_, 2025

**JEFF ANDERSON & ASSOCIATES**  
By \_\_\_\_\_  
Jennifer Stein, Esq.  
*Counsel for John Doe SF 1218, Jane Doe SF 2017,  
John Doe SF 1510, John Doe SF 2028, John Doe SF  
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By /s/ Brittany M Michael  
James I. Stang  
Brittany M. Michael  
Gail S. Greenwood  
*Counsel for the Official Committee of  
Unsecured Creditors*

Dated: July \_\_, 2025

**BOUCHER LLP**

By \_\_\_\_\_  
Kelsey Campbell, Esq.  
*Counsel for John Doe L.M. and John Doe W.C.D.*

Dated: July \_\_, 2025

**KBM LAW**

By \_\_\_\_\_  
Karen Barth Menzies, Esq.  
*Counsel for John Doe H.M.*

*August 6*  
Dated: ~~July~~ \_\_, 2025

**DONAHOO & ASSOCIATES, PC**  
By \_\_\_\_\_  
Richard E. Donahoo, Esq.  
*Counsel for C.M., G.J., and M.R.H.*

Dated: July \_\_, 2025

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By \_\_\_\_\_  
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*Counsel for G.W.*

Dated: July \_\_, 2025

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*Counsel for the Official Committee of  
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Dated: July \_\_, 2025

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Dated: July \_\_, 2025

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Dated: July \_\_, 2025

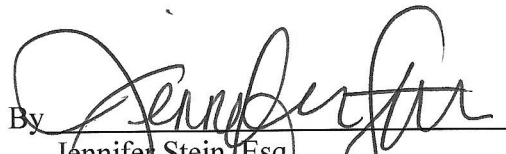
**DONAHOO & ASSOCIATES, PC**  
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Richard E. Donahoo, Esq.  
*Counsel for C.M., G.J., and M.R.H.*

Dated: July 29, 2025

**HERMAN LAW**  
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Dated: July \_\_, 2025

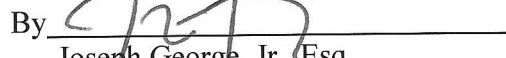
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Jennifer Stein, Esq.  
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Jane Doe SF 1053*

Dated: July 22, 2025

**JOSEPH C. GEORGE, JR. LAW**

By   
Joseph George, Jr., Esq.  
*Counsel for Joseph Doe OAK 475*

Dated: July \_\_, 2025

**KETTERER, BROWNE & ASSOCIATES**

By \_\_\_\_\_  
Andy LeClair, Esq.  
*Counsel for John Doe A.L.R. and A.D.R.*

Dated: July \_\_, 2025

**LIAKOS LAW, APC**

By \_\_\_\_\_  
Jennifer Liakos, Esq.  
*Counsel for LL John Doe WC*

Dated: July 22, 2025

**MANLY, STEWART, & FINALDI**

By   
Vince Finaldi  
*Counsel for John SF-26 Doe*

Dated: July \_\_, 2025

**REICH & BINSTOCK, LLP**

By \_\_\_\_\_  
*Counsel for John PV Roe 554*

Dated: July \_\_, 2025

**RIBERA LAW FIRM**

By \_\_\_\_\_  
Sandra Ribera Speed, Esq.  
*Counsel for John Doe*

Dated: July \_\_, 2025

**SLATER SLATER SCHULMAN LLP**

By \_\_\_\_\_

1 Dated: July \_\_, 2025

**JOSEPH C. GEORGE, JR. LAW**

2 By \_\_\_\_\_  
3 Joseph George, Jr., Esq.  
4 Counsel for Joseph Doe OAK 475

5 Dated: July 29, 2025

**KETTERER, BROWNE & ASSOCIATES**

6 By \_\_\_\_\_  
7 Andy Leclair, Esq.  
8 Counsel for John Doe A.L.R. and A.D.R.

8 Dated: July \_\_, 2025

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9 By \_\_\_\_\_  
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11 Dated: July \_\_, 2025

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19 By \_\_\_\_\_  
20 Sandra Ribera Speed, Esq.  
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21 Dated: July \_\_, 2025

**SLATER SLATER SCHULMAN LLP**

22 By \_\_\_\_\_  
23 Counsel for John Roe 521, John Roe 644, John Roe  
24 457, John Roe 417, John Roe 499, John Roe 663,  
25 John Roe 664, Jane Roe

26 Dated: July \_\_, 2025

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27 By \_\_\_\_\_  
28 Robert Thompson, Esq.  
Counsel for John Doe A.D.R. and A.L.R.

1 Dated: July \_\_, 2025

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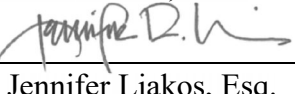
5 Dated: July \_\_, 2025

**KETTERER, BROWNE & ASSOCIATES**

6 By \_\_\_\_\_  
7 Andy LeClair, Esq.  
8 *Counsel for John Doe A.L.R. and A.D.R.*

8 Dated: July 29, 2025

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9 By  \_\_\_\_\_  
10 Jennifer Liakos, Esq.  
11 *Counsel for LL John Doe WC*

11 Dated: July \_\_, 2025

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14 Dated: July \_\_, 2025

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16 *Counsel for John PV Roe 554*

17 Dated: July \_\_, 2025

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20 *Counsel for John Doe*

21 Dated: July \_\_, 2025

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22 By \_\_\_\_\_  
23 *Counsel for John Roe 521, John Roe 644, John Roe*  
24 *457, John Roe 417, John Roe 499, John Roe 663,*  
25 *John Roe 664, Jane Roe*

26 Dated: July \_\_, 2025

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28 Robert Thompson, Esq.  
*Counsel for John Doe A.D.R. and A.L.R.*



1 Dated: July \_\_, 2025

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5 Dated: July \_\_, 2025

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8 Dated: July \_\_, 2025

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10 Jennifer Liakos, Esq.  
11 Counsel for LL John Doe WC

11 Dated: July \_\_, 2025

**MANLY, STEWART, & FINALDI**

12 By \_\_\_\_\_  
13 Vince Finaldi  
14 Counsel for John SF-26 Doe

14 Dated: July 30<sup>th</sup>, 2025

**REICH & BINSTOCK, LLP**

15 By \_\_\_\_\_  
16 Counsel for John PV Roe 554

17 Dated: July \_\_, 2025

**RIBERA LAW FIRM**

18 By \_\_\_\_\_  
19 Sandra Ribera Speed, Esq.  
20 Counsel for John Doe

21 Dated: July \_\_, 2025

**SLATER SLATER SCHULMAN LLP**

22 By \_\_\_\_\_  
23 Counsel for John Roe 521, John Roe 644, John Roe  
24 457, John Roe 417, John Roe 499, John Roe 663,  
25 John Roe 664, Jane Roe

26 Dated: July \_\_, 2025

**THOMPSON LAW OFFICE, PC**

27 By \_\_\_\_\_  
28 Robert Thompson, Esq.  
Counsel for John Doe A.D.R. and A.L.R.

4923-6870-5876.1 05068.002

1 Dated: July \_\_, 2025

**JOSEPH C. GEORGE, JR. LAW**

2 By \_\_\_\_\_  
3 Joseph George, Jr., Esq.  
4 *Counsel for Joseph Doe OAK 475*

5 Dated: July \_\_, 2025

**KETTERER, BROWNE & ASSOCIATES**

6 By \_\_\_\_\_  
7 Andy LeClair, Esq.  
8 *Counsel for John Doe A.L.R. and A.D.R.*

8 Dated: July \_\_, 2025

**LIAKOS LAW, APC**

9 By \_\_\_\_\_  
10 Jennifer Liakos, Esq.  
11 *Counsel for LL John Doe WC*

11 Dated: July \_\_, 2025

**MANLY, STEWART, & FINALDI**

12 By \_\_\_\_\_  
13 Vince Finaldi  
14 *Counsel for John SF-26 Doe*

14 Dated: July \_\_, 2025

**REICH & BINSTOCK, LLP**

15 By \_\_\_\_\_  
16 *Counsel for John PV Roe 554*

17 Dated: July \_\_, 2025

**RIBERA LAW FIRM**

18 By \_\_\_\_\_  
19 Sandra Ribera Speed, Esq.  
20 *Counsel for John Doe*

21 Dated: July 31, 2025

**SLATER SLATER SCHULMAN LLP**

22 By  \_\_\_\_\_

23 *Counsel for John Roe 521, John Roe 644, John Roe*  
24 *457, John Roe 417, John Roe 499, John Roe 663,*  
25 *John Roe 664, Jane Roe*

26 Dated: July \_\_, 2025

**THOMPSON LAW OFFICE, PC**

27 By \_\_\_\_\_  
28 Robert Thompson, Esq.  
*Counsel for John Doe A.D.R. and A.L.R.*

1 Dated: July \_\_, 2025

**JOSEPH C. GEORGE, JR. LAW**

2 By \_\_\_\_\_  
3 Joseph George, Jr., Esq.  
4 *Counsel for Joseph Doe OAK 475*

5 Dated: July \_\_, 2025

**KETTERER, BROWNE & ASSOCIATES**

6 By \_\_\_\_\_  
7 Andy LeClair, Esq.  
8 *Counsel for John Doe A.L.R. and A.D.R.*

8 Dated: July \_\_, 2025

**LIAKOS LAW, APC**

9 By \_\_\_\_\_  
10 Jennifer Liakos, Esq.  
11 *Counsel for LL John Doe WC*

11 Dated: July \_\_, 2025

**MANLY, STEWART, & FINALDI**

12 By \_\_\_\_\_  
13 Vince Finaldi  
14 *Counsel for John SF-26 Doe*

14 Dated: July \_\_, 2025

**REICH & BINSTOCK, LLP**

15 By \_\_\_\_\_  
16 *Counsel for John PV Roe 554*

17 Dated: July \_\_, 2025

**RIBERA LAW FIRM**

18 By \_\_\_\_\_  
19 Sandra Ribera Speed, Esq.  
20 *Counsel for John Doe*

21 Dated: July \_\_, 2025

**SLATER SLATER SCHULMAN LLP**

22 By \_\_\_\_\_  
23 *Counsel for John Roe 521, John Roe 644, John Roe*  
24 *457, John Roe 417, John Roe 499, John Roe 663,*  
25 *John Roe 664, Jane Roe*

26 Dated: July 29, 2025

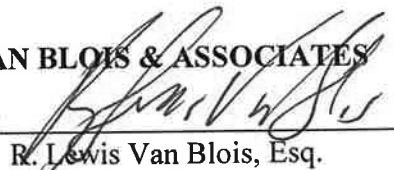
**THOMPSON LAW OFFICE, PC**

27 By Robert W. Thompson  
28 Robert Thompson, Esq.  
*Counsel for John Doe A.D.R. and A.L.R.*



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Dated: July \_\_, 2025

**VAN BLOIS & ASSOCIATES**  
By   
R. Lewis Van Blois, Esq.  
Counsel for Jane Doe 7

Dated: July 28, 2025

**THE ZALKIN LAW FIRM, P.C.**  
By \_\_\_\_\_  
Devin Storey, Esq.  
Counsel for John DB Roe SF and John MW Roe SF

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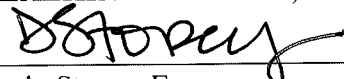
Dated: July \_\_, 2025

**VAN BLOIS & ASSOCIATES**

By \_\_\_\_\_  
R. Lewis Van Blois, Esq.  
*Counsel for Jane Doe*

Dated: July 25, 2025

**THE ZALKIN LAW FIRM, P.C.**

By   
Devin Storey, Esq.  
*Counsel for John DB Roe SF and John MW Roe SF*

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Dated: July \_\_, 2025

**VAN BLOIS & ASSOCIATES**

By \_\_\_\_\_  
R. Lewis Van Blois, Esq.  
*Counsel for Jane Doe 7*

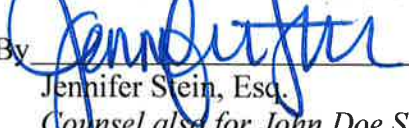
Dated: July \_\_, 2025

**THE ZALKIN LAW FIRM, P.C.**

By \_\_\_\_\_  
Devin Storey, Esq.  
*Counsel for John DB Roe SF and John MW Roe SF*

Dated: August 9, 2025  
*September*

**JEFF ANDERSON & ASSOCIATES**

By  \_\_\_\_\_  
Jennifer Stein, Esq.  
*Counsel also for John Doe SF 1237, John Doe SF 1882, John Doe SF 1226, John Doe SF 1894, John Doe SF 1549, and John Doe SF 1166*

Paul J. Pascuzzi, State Bar No. 148810  
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Attorneys for The Roman Catholic Archbishop of  
San Francisco

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re  
The Roman Catholic Archbishop of San  
Francisco,  
Debtor and  
Debtor in Possession.

Case No. 23-30564  
Chapter 11

The Roman Catholic Archbishop of San  
Francisco,  
Plaintiff,  
v.

Adv No. 25-03019

**STIPULATED ORDER GRANTING  
PRELIMINARY INJUNCTION AND  
GRANTING RELIEF FROM STAY**

John DB Roe SF, John Doe H.M, C.M.,  
John Doe SF 1218, Jane Doe SF 2017,  
John Roe 521, John Roe 663, John Doe  
664, LL John Doe WC, John Doe SF

Judge: Hon. Dennis Montali  
Date: September 4, 2025  
Time: 1:30 p.m.  
Place: Zoom.Gov

1 2028, John Doe SF 1510, John Doe, John  
2 Roe 644, Jane Roe, G.J., M.R.H., John  
3 Doe SF 1426, John Doe L.M., John Roe  
4 457, John Doe A.D.R., John Doe A.L.R.,  
5 John Roe 417, John Roe 499, G.W.,  
6 Joseph Doe OAK 475, John Doe MR  
7 1236, Jane Doe 7, John PV Roe 554, John  
8 Doe F.O., John Doe CLG03522, John Doe  
9 SF 1913, Jane Doe SF 1260, John Doe SF  
10 1026, John Doe SF 1196, Jane Doe SF  
11 1200, John Doe SF 1201, Jane Doe SF  
12 1233, Joseph Doe SF 601, and Jane Doe  
13 116,

Defendants,

Based on the Stipulation of The Roman Catholic Archbishop of San Francisco (the  
“Debtor”), the Official Committee of Unsecured Creditors (the “Committee”), and each of the  
defendants in this Action (the “Survivor Defendants”; collectively the Debtor, the Committee, and  
the Survivor Defendants are the “Parties”), IT IS ORDERED:

1. Pursuant to 11 U.S.C. § 105(a) and the agreed Stipulated Stay Injunction, the  
Survivor Defendants are enjoined from prosecuting any of the Affiliate State Court Actions  
identified on **Exhibit B** to this Order, including against any of the Non-Debtor Affiliates, listed on  
**Exhibit A** to this Order, named therein.<sup>1</sup>

2. The 5 state court actions, which are identified on **Exhibit C** to this Order (the  
“Released State Court Actions”), are released from the Stipulated Stay Injunction and may proceed  
to trial subject to the following terms:

a) The Plaintiffs may prosecute, and any court where the action is pending may proceed  
with all necessary actions to adjudicate, the Released State Court Actions through  
final judgment, including against the Debtor and all non-Debtor defendants.

b) The Debtor is authorized to pay defense costs in the Released State Court Actions  
that are not paid by an insurer, notwithstanding any prior order of the Court.

///

<sup>1</sup> Additional state court actions may be added to this Order by stipulation of the Debtor,  
Committee and survivor claimant.

1 c) Entry of a judgment against any defendant in the Released State Court Actions shall  
2 not create a lien against any non-insurance asset of the Debtor or any Non-Debtor  
3 Affiliate. For the avoidance of doubt, nothing in this Stipulation should be construed  
4 to prevent a lien from attaching to the Debtor's and/or any Non-Debtor Affiliate's  
5 insurance policies or the proceeds of such policies, or the assets of any defendant that  
6 is not the Debtor or a Non-Debtor Affiliate.

7 d) No Plaintiff may create or take any action to effectuate the creation or imposition of  
8 any lien against any non-insurance asset(s) of the Debtor or any Non-Debtor  
9 Affiliate. Further, no Survivor may collect, levy, execute, or otherwise enforce any  
10 judgment against any non-insurance asset(s) of the Debtor or any Non-Debtor  
11 Affiliate.

12 3. Nothing in this Order is an admission by any Party, or a determination or finding of  
13 fact by this Court, as to the allegations in the Injunction Motion or in any oppositions filed thereto,  
14 or the merits of any of the issues raised therein.

15 4. The Stipulated Stay Injunction and the automatic stay imposed by 11 U.S.C. § 362(a)  
16 are further modified to allow any Survivor (regardless of whether their claims are selected as  
17 Released State Court Actions) to make written settlement demands on the Debtor and any non-  
18 Debtor defendant(s) and request that the Debtor and any non-Debtor defendant(s) tender those  
19 demands on their respective insurers and request that the insurers pay those demands.

20 5. For the avoidance of doubt, and except as provided in Paragraphs 2 and 4, nothing  
21 in this Order modifies, lifts, or vacates the automatic stay imposed by 11 U.S.C. § 362(a).

22 6. This Court shall retain jurisdiction to hear and determine all matters arising from or  
23 related to the implementation, interpretation, and/or enforcement of this Order.

24 7. The Stipulated Stay Injunction is an interim order and not a final adjudication on the  
25 merits of the Injunction Motion or the relief requested in the Complaint.

26 8. Any Party may request that the Bankruptcy Court modify or rescind this Order by  
27 filing a motion in this case, except that the Released State Court Actions shall not be stayed or  
28 otherwise enjoined without the consent of the Committee and the applicable Plaintiff/Survivor or

1 by the Court upon a showing of extraordinary circumstances. The requesting party must give the  
2 Debtor and the Committee at least three (3) days' written notice prior to filing the request and may  
3 not set the matter for hearing on less than 30 days' notice from the time of filing.

4 9. Any party in interest that is not a Party, may seek relief from the injunction imposed  
5 by this Order, by filing a motion in the Debtor's chapter 11 case (the "Bankruptcy Case"), setting  
6 forth cause sufficient to justify relief pursuant to 11 U.S.C. § 362(d).

7  
8 **\*\*\*END OF ORDER\*\*\***  
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# EXHIBIT A



## **Exhibit A**

### **Parishes and Missions**

All Hallows Chapel  
All Souls Church (All Souls School)  
Assumption Church (Tomaes)  
Cathedral of St. Mary of the Assumption  
Church of the Epiphany (Epiphany School)  
Church of the Good Shepherd (Good Shepherd School)  
Church of the Nativity (Nativity School) (Menlo Park)  
Church of the Nativity (San Francisco)  
Corpus Christi Church  
Holy Angels Church (Holy Angels School)  
Holy Name of Jesus Church (Holy Name School)  
Immaculate Heart of Mary Church (Immaculate Heart of Mary School)  
Mater Dolorosa Church  
Mission Dolores Basilica  
Most Holy Redeemer Church  
Most Holy Rosary Chapel  
Notre Dame Des Victoires (Ecole Notre Dame des Victoires)  
Old St. Mary's Church  
Our Lady of Fatima Russian Byzantine Catholic  
Our Lady of Guadalupe Mission (Brisbane)  
Our Lady of Angels Church (Our Lady of Angels School)  
Our Lady of Loretto Church (Our Lady of Loretto School)  
Our Lady of Lourdes Church  
Our Lady of Mercy Church (Our Lady of Mercy School)  
Our Lady of Mount Carmel Church (Mill Valley)  
Our Lady of Mount Carmel Church (Our Lady of Mt. Carmel School) (Redwood City)  
Our Lady of Perpetual Help (Our Lady of Perpetual Help School)  
Our Lady of the Pillar Church  
Our Lady of Refuge Mission  
Our Lady of the Visitation Church (Our Lady of the Visitation School)  
Our Lady of the Wayside  
Sacred Heart Church  
San Jose Obero Church  
Shrine of St. Francis of Assisi  
St. Agnes Church  
St. Andrew Church  
St. Anne of the Sunset Church (St. Anne School)  
St. Anselm Church (St. Anselm School)  
St. Anthony Church (Menlo Park)  
St. Anthony Mission (Pescadero)  
St. Anthony of Padua Church (Novato)  
St. Anthony of Padua Church

St. Augustine Church  
St. Bartholomew Church  
St. Benedict Parish  
St. Boniface Church  
St. Brendan Church (St. Brendan School)  
St. Bruno Church  
St. Catherine of Siena Church (St. Catherine of Siena School)  
St. Cecilia Church (St. Cecilia School) (San Francisco)  
St. Cecilia Church (Lagunitas)  
St. Charles Borromeo Church  
St. Charles Church (St. Charles School)  
St. Denis Church  
St. Dominic Church  
St. Dunstan Church (St. Dunstan School)  
St. Elizabeth Church  
St. Emydius Church  
St. Finn Barr Church (St. Finn Barr School)  
St. Francis of Assisi  
St. Gabriel Church (St. Gabriel School)  
St. Gregory Church (St. Gregory School)  
St. Helen Mission  
St. Hilary Church (St. Hilary School)  
St. Ignatius Church  
St. Isabella Church (St. Isabella School)  
St. James Church (St. James School)  
St. John the Evangelist Church (St. John School)  
St. John of God Chapel  
St. Kevin Church  
St. Luke Church  
St. Mark Church  
St. Mary Magdalene Mission  
St. Mary Star of the Sea  
St. Mary Church  
St. Matthew Church (St. Matthias Preschool)  
St. Matthias Church  
St. Michael Korean Church  
St. Monica-St. Thomas the Apostle Church (St. Monica School)  
St. Patrick Church (St. Patrick School) (St. Patrick Thrift Shop) (Larkspur)  
St. Patrick Church (San Francisco)  
St. Paul Church (St. Paul School)  
St. Paul of the Shipwreck  
St. Peter Church (Pacifica)  
St. Peter Church (St. Peter School) (San Francisco)  
St. Philip the Apostle (St. Philip School)  
St. Pius Church (St. Pius School)  
St. Raphael Church (St. Raphael School)

St. Raymond Church (St. Raymond School)  
St. Rita Church  
St. Robert Church (St. Robert School)  
St. Sebastian Church  
St. Stephen Church (St. Stephen School)  
St. Teresa Church  
St. Thomas More Church (St. Thomas More School)  
St. Timothy Church (St. Timothy School)  
St. Veronica Church (St. Veronica School)  
St. Vincent de Paul Church (St. Vincent de Paul School)  
Star of the Sea Church (Stella Maris Academy)  
Sts. Peter & Paul Church (Sts. Peter & Paul School)

**The Archdiocese of San Francisco Parish and School Juridic Persons Real Property Support Corporation**

**Cemeteries**

Holy Cross Catholic Cemeteries  
Saint Mary Magdalene Catholic Cemetery  
Mt. Olivet Cemetery  
Our Lady of Pillar Cemetery  
Tomaes Bay Cemetery

**Archbishop Riordan High School**

**Marin Catholic High School**

**Junipero Serra High School**

**Sacred Heart Cathedral Preparatory**

**Vallombrosa Retreat Center**

**Serra Clergy House**

**The Archdiocese of San Francisco Parish, School and Cemetery Juridic Persons Capital Assets Support Corporation**

**The Roman Catholic Seminary of San Francisco**

**Catholic Charities CYO of the Archdiocese of San Francisco**

**The Benedict XVI Institute for Sacred Music and Divine Worship**

# EXHIBIT B

## Amended Exhibit B

### Catholic Charities CYO of the Archdiocese of San Francisco

1. John DB Roe SF v. Doe 1, Archdiocese; Defendant Doe 2, School; and Does 1 through 100; Case No. 22CV023360
2. John Doe H.M. v. Doe 1, a Corporation Sole; Doe 2, a religious entity form unknown; Doe 3, a religious school form unknown; and Does 4 through 500; Case No. 22CV024656
3. C.M. v. Doe 1, a corporation sole; Doe 2, a nonprofit public benefit corporation; Does 3 a religious nonprofit corporation; and Does 4 through 100; Case No. 22CV019998
4. John Doe SF 1218 v. Doe 1, a corporation sole; Doe 2, a corporation sole; Doe 3, an entity form unknown; Doe 4, an entity form unknown; Doe 5, an entity form unknown; and Doe 6 through Doe 100; Case No. 22CV021136
5. Jane Doe SF 2017 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; Doe 4 an entity form unknown; and Doe 5 through Doe 100; Case No. 22CV024597
6. John Roe 521 v. Doe Archdiocese; Doe Parish; Case No. 22CV018853
7. John Roe 663 v. Doe Archdiocese, a California Corporation; Doe Parish, a California Nonprofit Corporation; and Does 1 through 500; Case No. 22CV023916
8. John Doe 664 v. Doe Archdiocese, a California Corporation; Doe Parish, a California Nonprofit Corporation; and Does 1 through 500; Case No. 22CV023925
9. LL John Doe WC v. Defendant Doe Archdiocese; Defendant Doe Parish; Defendant Doe Religious Order; Defendant Does 1 through 500; Case No. 22CV021767
10. John Doe SF 2028 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; and Doe 4 through Doe 100; Case No. 22CV024838
11. John Doe SF 1510 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, and Doe 4 through Doe 100; Case No. 22CV020445
12. John Doe v. Doe 1, a Religious Corporation Sole; Doe 2, a domestic nonprofit organization; and Does 3 through 50; Case No. 22CV010038
13. John Roe 644 v. Doe Archdiocese, a California Corporation sole; Doe Parish, a California Corporation; and Does 1 through 500; Case No. 22CV023721

14. Jane Roe v. Doe 1, a private entity; Doe 2, an individual; and Does 1 through 500; 23CV058144
15. G.J. and M.R.H. v. The Roman Catholic Archbishop of San Francisco, a domestic nonprofit corporation; Catholic Charities CYO of The Archdiocese of San Francisco, a domestic nonprofit corporation; and Does 3-20; Case No. RG20081797 (G.J., #56a)
16. G.J. and M.R.H. v. The Roman Catholic Archbishop of San Francisco, a domestic nonprofit corporation; Catholic Charities CYO of The Archdiocese of San Francisco, a domestic nonprofit corporation; and Does 3-20; Case No. RG20081797 (M.R.H., #56b)
17. John Doe SF 1426 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; and Doe 4 through Doe 100; Case No. 22CV020670
18. John Doe L.M. v. Doe 1 Archdiocese, a corporation sole; Doe 2 Parish, a religious entity form unknown; Doe 3 School, a religious nonprofit corporation; Doe 4 Religious Order, a religious nonprofit corporation; and Does 5-500; Case No. 22CV023773
19. John Roe 457 v. Doe Archdiocese, a corporation sole; Doe 2 Parish, a California Non-Profit Corporation; Doe Perpetrator, an individual; and Does 1 through 500; 22CV015557
20. John Doe A.D.R. v. Doe Archdiocese, a Corporation Sole; Doe Religious Order, a Religious Order, a Religious Corporation; and Doe 1 through Doe 500; Case No. 21CV004304
21. John Doe A.L.R. v. Doe Archdiocese, a Corporation Sole; Doe Religious Order; a Religious Corporation; and Doe 1 through Doe 500; Case No. 21CV004307
22. John Roe 417 v. Doe Archdiocese, a California Corporation sole; Doe Parish, a California Nonprofit Religious Corporation; and Does 1 through 500; Case No. 22CV018871
23. John Roe 499 v. The Roman Catholic Archbishop of San Francisco, a corporation sole; Catholic Charities CYO of the Archdiocese of San Francisco, a California Non-Profit Corporation; D.G., an individual; and Does 1 through 500; Case No. 23CV030277
24. G.W. v. Catholic Charities CYO of the Archdiocese of San Francisco; Does 1 through 25; Case No. CIV2101248
25. John Doe SF 1237 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV022053
26. John Doe SF 1882 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV023067

27. John Doe SF 1226 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV022050
28. John Doe SF 1894 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, Doe 5, and Doe 6 through Doe 100, inclusive; Alameda County Case No. 22CV023069
29. John Doe SF 1549 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV021924
30. John Doe SF 1166 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV021961

**The Roman Catholic Seminary of San Francisco aka St. Patrick's Seminary**

1. Joseph Doe OAK 475 v. Doe 1, a religious corporation sole; Doe 2, a religious entity form unknown; Does 3, a religious entity form unknown; Doe 4 through Doe 100; Case No. 22CV019899
2. John Doe MR 1236 v. Doe 1, a corporation sole; Doe 2, a corporation sole; Doe 3, an entity form unknown; Doe 4, an entity form unknown; and Doe 5 through Doe 100; Case No. 22CV022052
3. Jane Doe 7 v. Doe 1, Doe 2, Doe 3, Doe 4; Case No. RG20065264
4. John PV Roe 554 v. Doe 1 Archdiocese; Doe 2 Parish; Doe 3 Parish; Doe 4 Parish; and Does 5 through 500; Case No. 22CV024736

**Sacred Heart Cathedral Preparatory**

1. Joseph Doe SF 601 v. Doe 1, a religious corporation sole; Doe 2, a religious entity for unknown; Doe 3, a religious entity for unknown; Doe 4, a religious entity for unknown; and Doe 5 through Doe 100; Case No. 22CV024713.
2. Jane Doe 116 v. Does Archdiocese; Doe Parish; Doe School; Does Religious Order; Does Education Corporation; and Does 1 through 500; 22CV023807

**Junipero Serra High School**

1. John Doe CLG03522 v. Doe Archdiocese, a California Corporation Sole; Doe Parish, a religious entity form unknown; and DOES 1-500; Case No. 22CV024153
2. John Doe SF 1913 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Does 3 through Does 100; Case No. 22CV023455

### **Marin Catholic High School**

1. Jane Doe SF 1260 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Does 3 through Does 100; Case No. 22CV020842
2. John Doe SF 1026 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; and Does 4 through Does 100; Case No. Case No. RG21086082
3. Jane Doe SF 2017 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; Doe 4 an entity form unknown; and Doe 5 through Doe 100; Case No. 22CV024597
4. John Doe SF 1196 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV020664
5. Jane Doe SF 1200 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV020668
6. John Doe SF 1201 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV020669
7. Jane Doe SF 1233 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV022051

### **Riordan High School**

1. John Doe F.O. v Doe Archdiocese, a Corporation sole; Doe Religious Order, a Business Organization Form Unknown; and Does 3 through 100; Case No. 22CV024965.



# EXHIBIT C

## Exhibit C

1. John SF-26 Doe, an individual, v. Doe Archdiocese, et al., Alameda County Superior Court Case No. 22CV023657
2. Jane Doe SF 1053, an individual, v. DOE 1, a Corporation Sole, et al., Alameda County Superior Court Case No. RG21107972
3. John Doe W.C.D., an individual, v. DOE 1 Archdiocese, a corporation sole, et al., Alameda County Superior Court Case No. 22CV013926
4. Jane Doe SF 1260, an individual, v. DOE 1, a corporation sole., et al., Alameda County Superior Court Case No. 22CV020842
5. John MW Roe SF, individually, v. Defendant Doe 1, Archdiocese, et al., Alameda County Superior Court Case No. 22CV018182